

# Exhibit A

Date Filed 3/6/2023 4:48 PM  
Superior Court - Middlesex  
Docket Number

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COMMONWEALTH OF MASSACHUSETTS  
SUPERIOR COURT DEPARTMENT

MIDDLESEX, ss.

ROSE MITCHELL, )  
Plaintiff, )  
v. )  
METRO-GOLDWYN-MAYER )  
STUDIOS, INC. )  
Defendant. )

Civil Action No.

23-640

COMPLAINT AND DEMAND FOR JURY TRIAL

3/6/23

**RECEIVED**

THE PARTIES

1. The Plaintiff, Rose Mitchel is an individual residing in the town of Shrewsbury, Worcester County, Massachusetts.
2. The Defendant, Metro-Goldwyn-Mayer Studios, Inc., is a foreign corporation with a principal place of business at 245 N. Beverly Drive, Beverly Hills, CA 90210, with a registered agent located at 155 Federal Street, Suite 700, Boston, MA 02110.

JURISDICTION AND VENUE

3. Plaintiff repeats and incorporates by reference to the allegations previously stated.
4. This Honorable Court has jurisdiction over the Defendant and venue is proper because this action arises from acts and occurrences within the Commonwealth of Massachusetts, the alleged event occurred in Middlesex County. RELEVANT FACTS
5. On June 2, 2022, Rose Mitchel was employed by Empire Casting, LLC, as a background actor.
6. On or about June 2, 2022, Defendant, Metro-Goldwyn-Mayer Studios, Inc. ("MGM"), contracted with Empire Casting, LLC, to provide background actors for a project underway in the Commonwealth.

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7. The Production, Challengers (formally Title Town), began principal photography and filming in the Commonwealth during May of 2022.
8. On or about June 2, 2022, Defendant MGM conduction production of the Challengers at the Wedgewood Club, located at 85 Page Road, Bedford, MA ("Subject Premises").
9. On or about June 2, 2022, Plaintiff Rose Mitchell was working in her capacity as a background actor at the Subject Premises.
10. While traversing through the crew tent, Plaintiff Rose Mitchell was caused to trip and fall over a sheet of misplaced, unsecured plywood.
11. Due to the absence of any notice, barrier, or any other reasonable means of warning of the hazardous condition, Plaintiff Rose Mitchell tripped, fell, and sustained severe injuries.
12. As a direct result of the Defendant's negligence, the Plaintiff Rose Mitchell suffered severer and permanent injuries.
13. But for the Defendant's negligence, the decedent Plaintiff Rose Mitchell would not have suffered severe pain and suffering, intensive and invasive treatments.

#### CLAIMS

**Rose Mitchel V. Metro-Goldwyn-Mayer Studios Inc.**

#### COUNT I: NEGLIGENCE

14. The Plaintiff restates and reavers all prior paragraphs by reference as if stated fully herein.
15. On or about June 6, 2022, the Defendant MGM breached a duty of care owed to the Plaintiff including but not limited to creating a dangerous condition and failing to warn and/or take other reasonable measures to prevent access to an area where it was reasonably foreseeable that Plaintiff Rose Mitchel would enter.
16. As a direct and proximate result of the negligence of Defendant MGM Plaintiff Rose Mitchell caused to sustain severe injuries and damages.
17. As a further direct and proximate result of the negligence of Defendant MGM, the Plaintiff Rose Mitchell sustained pain and suffering, and will for an indefinite time in the future be obliged to incur medical expense, lost wages, and other associated damages.

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WHEREFORE, Plaintiff Rose Mitchell demands judgment and damages of the Defendant herein in a sum to be determined by the trial of this action, plus interest and costs as provided by law.

**JURY DEMAND**

Plaintiff requests a jury trial on all claims as set herein.

Respectfully Submitted:

Attorneys for the Plaintiffs,

Sheff & Cook, LLC

/s/ Julie N. DeNardo

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Date: March 6, 2023